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Lead Counsel for Plaintiff

[Additional counsel appear on signature page.]

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

JIM BROWN, Individually and On
Behalf of All Others Similarly Situated,
Plaintiff,

vs.

BRETT C. BREWER, et al.,
Defendants.

No. 2:06-cv-03731-GHK-SH

CLASS ACTION

LEAD PLAINTIFF'S NOTICE OF
MOTION AND MOTION FOR (1)
FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND PLAN
OF ALLOCATION OF SETTLEMENT
PROCEEDS; AND (2) AN AWARD
OF ATTORNEYS' FEES AND
EXPENSES

DATE: May 16, 2011

TIME: 9:30 a.m.

COURTROOM: The Honorable
George H. King

1 TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

2 PLEASE TAKE NOTICE that on May 16, 2011, at 9:30 a.m., in the Courtroom
3 of the Honorable George H. King, United States District Judge, at the Edward R.
4 Roybal Federal Building and United States Courthouse, 255 East Temple Street, Los
5 Angeles, California, Lead Plaintiff will and hereby moves for orders (1) finally
6 approving the settlement as set forth in the Amended Stipulation of Settlement dated
7 February 4, 2011 ("Stipulation"), and dismissing the Action with prejudice; (2)
8 approving the Plan of Allocation of settlement proceeds; and (3) awarding Lead
9 Counsel attorneys' fees of 27% of the Settlement Fund plus expenses incurred in this
10 class action, as well as an award to Lead Plaintiff. Lead Plaintiff's motion is based
11 upon the Memorandum of Points and Authorities in Support of Lead Plaintiff's
12 Motion for Final Approval of Class Action Settlement and Plan of Allocation of
13 Settlement Proceeds, the Memorandum of Points and Authorities in Support of an
14 Award of Attorneys' Fees and Expenses, the declarations of counsel submitted in
15 support thereof, the Stipulation, all other pleadings and matters of record, and such
16 additional evidence or argument as may be presented at the hearing on Lead Plaintiff's
17 motion.

18 DATED: March 21, 2011

Respectfully submitted,

19 ROBBINS GELLER RUDMAN
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s/ Ellen Gusikoff Stewart
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9 Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2011, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 21, 2011.

s/ Ellen Gusikoff Stewart

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Manual Notice List

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